

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IRMA TOVAR, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08-cv-4008
)	Judge Kendall
PLAZA BANK,)	Magistrate Judge Nolan
)	
Defendant.)	

**DEFENDANT PLAZA BANK'S AGREED MOTION FOR AN EXTENSION OF TIME
TO FILE APPEARANCE AND RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, PLAZA BANK, by and through its attorneys, MARTIN & KARCAZES, LTD., moves this Court for the entry of an order granting an extension of time, up through and including August 21, 2008, for Defendant to file its appearance and respond to Plaintiff's Complaint, and in support thereof states:

1. Plaza Bank (hereinafter referred to as the "Bank") was served a copy of Plaintiff's Complaint and Summons on July 22, 2008.
2. The time to file the Bank's appearance and response to Plaintiff's Complaint within 20 days after service has expired.
3. The Bank's counsel has been investigating the veracity of Plaintiff's allegations by communicating with employees of the Bank and needs additional time to gather the facts in order to determine the appropriate response to Plaintiff's Complaint.
4. Counsel for the Bank contacted counsel for Plaintiff and is authorized to represent that Plaintiff has no objection to this motion for extension of time.
5. This is the Bank's first request for an extension of time.

6. Plaintiff will not be prejudiced by granting the Bank's Motion for Extension of Time to File its Appearance and Response to Plaintiff's Complaint.

WHEREFORE, the Defendant, PLAZA BANK, respectfully requests that this Court enter an order granting additional time to file its Appearance and respond to Plaintiff's Complaint, up to and including August 21, 2008.

Respectfully submitted,
PLAZA BANK

/s/ Allen C. Wesolowski
One of its attorneys

Dated: August 15, 2008

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